1 2 3	LAW OFFICE OF MICHAEL HEUMANN Michael Heumann, CA SBN 299622 901 H Street, Suite 405-5 Sacramento, CA 95814 Telephone: (916) 426-6692 mikeheumann.law@gmail.com Attorney for Defendant SANDRO ESCOBEDO		
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6	IN THE UNITED S	TATES DISTRICT COURT	
7	EASTERN DISTRICT OF CALIFORNIA		
8			
9	UNITED STATES OF AMERICA,	CASE NO. 2:21-CR-0007-DAD-10	
0	Plaintiff,	STIPULATION REGARDING CONTINUANCE FINDINGS AND ORDER	
1	V.	DATE: October 27, 2025,	
2	SANDRO ESCOBEDO	TIME: 9:30 a.m. COURT: Hon. Dale A. Drozd	
3	Defendants.	COURT. Holl. Date A. Diozd	
4			
15	STIPULATION		
6	1. By previous order, this matter was set for judgement and sentencing on October 27,		
17	2025,.		
18	2. By this stipulation, defendant Sandro Escobedo now moves to convert the sentencing		
19	date to a status conference and motion hearing on November 24, 2025, at 9:30 a.m.		
20	3. The parties agree and stipulate, and request that the Court find the following:		
21	a) Counsel for defendant will be filing a motion to withdraw the defendant's guilt		
22	plea to be heard on November 24, 2025, and the government will need time to respond and the		
23	defense will need time to reply to the government's response.		
24	b) Counsel for defendant bel	ieves that failure to grant the above-requested	
25	continuance would prevent him from having the motion to withdraw heard prior to sentencing		
26	c) The government does not	object to the continuance.	
27	4. The parties further agree to the following briefing schedule on defendant's motion to		
28	withdraw:		

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1	a) Motion to be filed by Octob	a) Motion to be filed by October 24, 2025	
2	b) Government's opposition du	Government's opposition due by November 10, 2025	
3	c) Defendant's reply due by N	Defendant's reply due by November 17, 2025	
4	IT IS SO STIPULATED.	IPULATED.	
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7	Dated: October 23, 2025	ERIC GRANT United States Attorney	
8		/s/ DAVID W. SPENCER	
9		DAVID W. SPENCER	
10		Assistant United States Attorney	
11			
12	Dated: October 23, 2025	/a/ MICHAEL HEHMANIN	
13	Dated: October 23, 2023	/s/ MICHAEL HEUMANN MICHAEL HEUMANN Counsel for Defendant	
14		SANDRO ESCOBEDO	
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18	ORDER		
19	Pursuant to the stipulation of the parties and good cause appearing, the sentencing hearing		
20	scheduled for October 27, 2025, is vacated and the case is continued to November 24, 2025, at 9:30 a.m.		
21	for hearing of defendant Sandro Escobedo's anticipated motion to withdraw plea and, if appropriate, for		
22	status re sentencing.		
23			
24	IT IS SO ORDERED.	γ	
25	Dated: October 24, 2025	Dale A. Drogd	
26	Ţ	UNITED STATES DISTRICT JUDGE	
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